

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 2:17-CR-20755

v.

HON. ROBERT H. CLELAND

D-5 RYAN TAYLOR,

Defendant.

GOVERNMENT’S SENTENCING MEMORANDUM

INTRODUCTION

Defendant Ryan Taylor planned and carried out an appalling drive-by shooting with several fellow Latin Counts gang members, which resulted in the death of victim R.R. and injuries to victims B.H. and S.B. Indeed, Taylor fired the bullet that killed R.R. For the reasons set forth below, the government respectfully recommends that the Court sentence Taylor to a within-guidelines term of 360 months in prison and 3 years of supervised release.

LAW AND ARGUMENT

A. The nature and circumstances of the offense and history and characteristics of the defendant, 18 U.S.C. § 3553(a)(1).

Since at least June 2017, Taylor was a member of the Latin Counts criminal enterprise and affiliated with the gang’s Toledo Mafia Counts (TMC) set. The Latin

Counts, also referred to as the “Almighty Latin Count Nation,” is a criminal street gang with branches in Michigan and Illinois. The Latin Counts originated in the 18th Street corridor of south Chicago, Illinois, and have been active since the late-1950s. The Latin Counts are engaged in a variety of crimes such as murders, assaults, and illegal drug distribution. In Michigan, there are multiple subsets or “sets” within the Latin Counts including, but not limited to, the Toledo Mafia Counts, Olivet Gangster Counts, Downriver Mafia Counts, and Cadet Mafia Counts.

The TMC set began on the 5600 block of Toledo Street, in southwest Detroit, Michigan, in the Eastern District of Michigan. The TMC set claims Toledo Street, including the intersection of Toledo Street and Lansing Street, as its territory.

The Latin Counts identify themselves with red and black clothing and accessories typically tilted to the left. The Latin Counts utilize the five-point star, five-point crown, the letter combination of “LC,” five dots, the knight’s helmet, and the number “5” as common symbols for social media website postings, street graffiti, and/or tattoos. In addition, Latin Counts also display hand signs to represent the Latin Count symbols, such as the letters “L” and “C,” or five fingers to represent the number five. One way that Latin Counts members confirm an individual’s membership is by asking the time, to which the expected answer is “Bosstime.”

The Latin Counts use a unique written language that members use to communicate with each other in text messages and on Internet social media, and to

display on clothing. For example, when writing the Spanish word of endearment “Amor” to each other, Latin Counts members replace the letter “A” with a “V” because the letter “A” is associated with a rival gang from the Chicago area, which becomes the spelling “Vmor.” The unique language of the Latin Counts includes frequent usage of words and phrases such as “Conde” and “on my C,” and various spellings of “Ooowweee.” Latin Counts members frequently capitalize and exalt the letter “C,” such as spelling the word “Black” as “BlaC,” and using gang nicknames that begin with the letter “C,” such as “C-Man,” “C-Lo,” or “C-5.”

The Latin Counts have various literature that explains the significance of their name, symbols, and their relationships to each other. Latin Counts literature also generally addresses the gang’s history as well as certain “laws,” “oaths,” philosophies, organizational structures, rules, and procedures.

The Latin Counts have a hierarchy that includes, but is not limited to, positions such as president, vice president, and minister of information. Other positions include “pee-wees,” who are newer members who need to prove themselves within the gang, and “hood chiefs,” who give orders and are leaders in charge of particular neighborhood subsets of the Latin Counts gang. The Latin Counts attend and participate in meetings, often times referred to as “church,” where orders are issued and received, ranks are awarded, and activities are coordinated. Such meetings would take place at specific locations such as members’ houses.

An individual becomes or is “put down” as a member of the Latin Counts by being “jumped in,” which is an initiation where current members of the gang physically punch, kick, strike, and beat the prospective member. The beating generally lasts between thirty seconds and one minute, but if a prospective member resists the beating or fights back then the beating may last longer. When the beating is over, the individual is officially a Latin Counts member.

Once granted membership to the Latin Counts, members are expected to “put in work.” “Work” includes crimes of violence that can range from assault to murder in order to protect the gang’s claimed territories, to deter others from engaging in activities such as the selling of illegal drugs in the gang’s claimed territories, to maintain and protect the gang’s reputation and the reputation of individual gang members, to intimidate rival gangs, and to retaliate for disrespect directed at the Latin Counts. “Work” can also include distributing illegal drugs, stealing firearms, selling stolen firearms, and committing home invasions, burglaries, or robberies. Latin Counts members enhance their status within the gang and earn greater respect from fellow members by committing crimes for, with, and on behalf of the gang.

Latin Counts members are expected to protect and support fellow members, stay united and loyal as a gang, aid fellow members who engage in violence, and avenge any wrongs committed upon fellow members and the gang. Latin Counts leaders can issue orders directing members to immediately attack a rival gang

member or any other targeted person when a rival or targeted person is encountered in public. Latin Counts members in Michigan communicate with fellow members incarcerated in jails or prisons and fellow members and leaders in Chicago.

Latin Counts members are expected to not discuss gang plans, activities, and business with those who are not members of the gang. The gang forbids its members from cooperating with law enforcement. If a Latin Counts member cooperates with law enforcement, the member could be “violated” or punished by the gang ranging from being assaulted to killed. “Violations” can also arise if a member fails to put in “work” for the gang, fails to follow orders, or infringes a rule or law of the gang.

The Latin Counts often clash with rival gangs including, but not limited to, the Surenos, Gangster Disciples, and Folks. There are also clashes among the sets of the Latin Counts as one set attempts to show preeminence over the other sets.

Latin Counts members use the Internet, specifically the social networking websites of Facebook and Instagram to post photographs, videos, symbols, and statements to exhibit the gang’s criminal activities or to publicize their association with the gang. Latin Counts members often display firearms on social media websites to showcase the gang’s power and intimidate rivals and the community. Latin Counts members also use social media websites to initiate and take credit for violent acts and other criminal activities.



Clockwise from upper left: Taylor brandishing an assault rifle; Taylor and co-defendant Alberto Jackson displaying Latin Counts hand signs; Taylor and co-defendants Gabriel Arocho and Justin Feiler wearing Latin Counts clothing; and Taylor and co-defendant Feiler wearing Latin Counts clothing.

On October 7, 2017, Taylor and several fellow Latin Counts gang members committed a terrible crime: A drive-by shooting in a residential area of southwest Detroit that killed victim R.R. and injured victims B.H. and S.B.

Before the shooting, fellow TMC members were displeased with A.S., a Latin Counts member who was part of a different set of the gang, because A.S. was exhibiting disrespect to the TMC set. As a result, leaders and members of the TMC set of the Latin Counts agreed that A.S. should be killed.

Consequently, on the night of October 7, 2017, a large group of Latin Counts members including Taylor met at a fellow member's residence to coordinate the shooting. At the meeting, several Latin Counts members including Taylor brought and displayed various types of firearms and ammunition. Furthermore, Taylor and fellow Latin Counts members discussed, among other things, A.S. as the planned victim, where the shooting would occur, who would help carry out the shooting and in what role, and what vehicles would be used to carry out the shooting.

Taylor and his fellow Latin Counts members then left the residence but split into groups to carry out the shooting. One group including Taylor served as the shooters and traveled together to 2462 S. Liddesdale Street in a red pickup truck while openly armed with loaded firearms; Taylor was the owner and driver of the red pickup truck. Another group of Latin Counts members served as lookouts and traveled together to the general area of 2462 S. Liddesdale Street in a separate

vehicle. A third group of Latin Counts members also served as lookouts and traveled together to the general area of 2462 S. Liddesdale Street in another separate vehicle.

At approximately 9:30 p.m., the group of Latin Counts members including Taylor arrived in front of the 2462 S. Liddesdale Street residence and began firing numerous guns at the residence and at a car that was parked on the street nearby. During the shooting, Taylor fired bullets from a .45 caliber firearm. A.S. was inside of the residence when the shooting occurred; multiple bullets struck the residence but A.S. was not struck and injured.

Two victims, B.H. and S.B., were inside the nearby parked car and each was struck by bullets fired by the Latin Counts members. B.H. and S.B. were not the planned victims of the shooting but were simply at the wrong place at the wrong time. B.H. and S.B. suffered multiple gunshot wounds but survived, however B.H.'s injuries were very serious as he eventually fell into a coma that lasted three weeks.



Photograph of the car in which B.H. and S.B. were sitting during the shooting, showing several bullet holes and shattered windows.

Additionally, one of the Latin Counts members who rode to the scene with Taylor, R.R., exited the red pickup truck, stood out on the street, and fired bullets during the shooting too. But R.R. was struck by a bullet, fell to the ground, and died at the scene. Taylor and his fellow Latin Counts members left R.R.'s body in the street to be found by responding Detroit police. The manner of R.R.'s death was later determined by a forensic medical examiner to be homicide and cause of death a single gunshot wound. The bullet recovered from R.R.'s body and other evidence established that Taylor fired the bullet that killed R.R.



Photograph of the shooting scene showing a blue tarp covering R.R.'s body and numerous orange evidence markers where the police located bullet casings.



Photograph from video surveillance showing Taylor's red pickup truck two blocks away from the shooting scene at approximately 9:33 p.m. on October 7, 2017.

The nature and circumstances of Taylor's criminal conduct are appalling and exhibited callous disregard for human life. Taylor's criminal conduct with his fellow Latin Counts gang members is a stark example of how the Latin Counts criminal enterprise poses a grave threat to public safety. Sentencing Taylor to a within-guidelines term of 360 months in prison is justified under this factor.

- B. The sentence imposed must reflect the seriousness of the offense, promote respect for the law, and provide just punishment, 18 U.S.C. § 3553(a)(2)(A).**

As described above, Taylor's instant offenses—conspiracy to commit murder in aid of racketeering and assault with a dangerous weapon in aid of racketeering, with an underlying crime of first degree murder—were very serious. A prison sentence of 360 months for Taylor is appropriate and just, based on the seriousness of the offenses and to promote respect for the law.

C. The sentence imposed must afford adequate deterrence to criminal conduct, and protect the public from further crimes of the defendant, 18 U.S.C. § 3553(a)(2)(B) and (C).

A prison sentence of 360 months would specifically deter Taylor from engaging in future criminal conduct. Furthermore, that lengthy time period in prison would remove Taylor from the public and thus protect the public from further crimes by Taylor. Sentencing Taylor to 360 months in prison is justified under this factor as well.

CONCLUSION

For the reasons stated above, the government respectfully recommends that the Court sentence Taylor to a within-guidelines term of 360 months in prison and 3 years of supervised release.

Respectfully Submitted,

MATTHEW SCHNEIDER
UNITED STATES ATTORNEY

s/Louis Crisostomo

Louis Crisostomo
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
313-226-9100
Louis.Crisostomo@usdoj.gov
IL 6288094

Dated: October 17, 2019

CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Kimberly Stout, Esq.

Wade Fink, Esq.

s/Louis Crisostomo

Louis Crisostomo

Assistant United States Attorney

211 W. Fort Street, Suite 2001

Detroit, Michigan 48226

313-226-9100

Louis.Crisostomo@usdoj.gov

IL 6288094